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9 **UNITED STATES DISTRICT COURT**

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11 **DISTRICT OF NEVADA**

12 DR. F. VICTOR RUECKL, an individual,

13 CASE NO. 2:19-cv-02186-KJD-NJK

14 Plaintiff,

15 v.

16 INMODE LTD., a foreign limited liability
17 corporation; DOES 1 – 10, INCLUSIVE; AND
18 ROE CORPORATIONS 11-20, INCLUSIVE,

19 Defendants.

20 **STIPULATION AND PROPOSED
21 ORDER TO EXTEND TIME TO FILE
22 OPPOSITION TO DEFENDANT
23 INMODE LTD.'S MEMORANDUM OF
24 POINTS AND AUTHORITIES IN
25 SUPPORT OF MOTION TO DISMISS
26 PURSUANT TO FED. R. CIV. P.
27 12(b)(2) AND (6) [DKT NO. 10]**

28 **[FIRST REQUEST]**

29 Plaintiff Dr. F. Victor Rueckl ("Dr. Rueckl"), by and through his attorneys, LIPSON
30 NEILSON P.C., and Defendant InMode, Ltd., by and through its attorneys,
31 RUSHFORTH LEE & KEIFER LLP, hereby stipulate to continue Plaintiff's deadline to
32 respond to InMode LTD's ("InMode" or "Defendant") Motion to Dismiss Pursuant to Fed.
33 R. Civ. P. 12(B)(2) and (6) [DKT. NO. 10]:

34 **STIPULATION**

35 1. On February 7, 2020, Defendant filed a Memorandum of Points and
36 Authorities In Support Of Motion To Dismiss Pursuant To Fed. R. Civ. P. 12(B)(2) and
37 (6) [Dkt No. 10] (hereafter, "Motion to Dismiss") in response to the Complaint filed on
38 December 19, 2019 [Dkt. No. 1].

2. Plaintiff's Opposition to Defendant's Motion to Dismiss is currently due on February 21, 2020.

3. In order to adequately respond to the Motion to Dismiss, Plaintiff respectfully requests an extension until **March 6, 2020**.

4. Defendant's counsel has conferred with Plaintiff's counsel regarding this Stipulation and both parties agree to the extension.

5. This Stipulation is made in good faith and not for any dilatory or other improper purpose. Defendant will not suffer any prejudice if the Court permits Plaintiff the requested extension. Defendant has consented to the extension.

6. This is the first request for an extension of time for Plaintiff to respond to Defendant's Motion to Dismiss.

<p>LIPSON NEILSON P.C.</p> <p><i>/s/ Jonathan K. Wong</i> By: _____ JOSEPH P. GARIN, ESQ. Nevada Bar No. 6653 JONATHAN K. WONG, ESQ. Nevada Bar No. 13621 9900 Covington Cross Drive, Suite 120 Las Vegas, Nevada 89144 (702) 382-1500</p> <p><i>Attorneys for Plaintiff Dr. F. Victor Rueckl</i></p>	<p>RUSHFORTH LEE & KIEFER LLP</p> <p><i>/s/ Matthew W. Park</i> By: _____ MATTHEW W. PARK, ESQ. Nevada Bar No. 12062 1707 Village Center Circle, Suite 150 Las Vegas, Nevada 89134 (702) 255-4552</p> <p><i>Attorneys for Defendant InMode, Ltd.</i></p>
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ORDER

IT IS SO ORDERED.

UNITED STATES DISTRICT COURT JUDGE

DATED: February 20, 2020